



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 88058	2. EPA Product Manager Tony Kish	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Cyclanilide Technical	PM# 22	
5. Name and Address of Applicant (Include ZIP Code) Orion ATO, LLC P. O. Box 21720, Mesa, AZ 85277 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 264-565 Product Name Cyclanilide Technical	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This is a registration application for a new technical product that is substantially similar to a currently registered product.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No * Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Package wgt. No. per container	<input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 25kg not retail	5. Location of Label Directions <input type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product		
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other plastic sleeve			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Robert Hawk		Title Agent, Orion ATO, LLC		Telephone No. (Include Area Code) 928-342-3489	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Agent, Orion ATO, LLC			
4. Typed Name Robert Hawk		5. Date May 28, 2014			

ORION ATO, LLC

May 28, 2014

Document Processing Desk (APPL)
Office of Pesticide Programs (P7504C)
Environmental Protection Agency
Room S-4900, One Potomac Yard (South Building)
2777 S. Crystal Drive
Arlington, VA 22202

Attn: Tony Kish (PM 22), Fungicide Branch, Registration Division

Dear Mr. Kish:

Subject: Cyclanilide Technical (EPA Reg. No. 88058-x): Registration Application

Orion ATO, LLC wishes to register a technical product for manufacturing use only. In support of this application we have enclosed the following:

Application for Pesticide Registration (8570-1)
Confidential Statement of Formula (8570-4)
Certification with Respect to Citation of Data (8570-34)
Data Matrix (8570-35)
Proposed label (6 copies)
Supporting studies (3 copies, with Data Transmittal Document)

We have concluded that this regulatory action falls in PRIA 3 Category R351, for which the fee is \$12,596. Confirmation of payment is enclosed.

Please contact me if you have any questions.

Sincerely,



Robert Hawk
Source Dynamics LLC
Agent for Orion ATO, LLC

DATA TRANSMITTAL DOCUMENT

Name and Address of Data Submitter

Orion ATO
P. O. Box 21720
Mesa, AZ 85277

Regulatory Action in Support of Which This Package is Submitted

Registration Application (88058-x): Chlorothalonil Technical

Transmittal Date

May 28, 2014

Submitted Studies (3 Copies)

R. Hawk, "Cylanilide Technical: Product Identity, Description of Materials, Manufacturing Process, Discussion of Impurities and Certification of Limits," Report No. C100928 (May 28, 2014), 55 pages, OPPTS 830.1550, 830.1600, 830.1620, 830.1670 and 830.1670

V. Damnjanovic, "Determination of Active Content and Impurity Profile of Cyclanilide," Report No. BD-001 (May 6, 2014), 163 pages, OPPTS 830.1700 and 830.1800

J. Skopek, "Determination of Physical-Chemical Properties of Cyclanilide," Report No. BD-001-PHYCHEM (May 16, 2014), 48 pages, OPPTS 830.6602, 830.6603, 830.6604, 830.6313, 830.6314, 830.7000, 830.7200 and 830.7300

Company Official: Robert Hawk

Signature:



Company Name:
Company Contact:

Orion ATO, LLC
Robert Hawk
Source Dynamics LLC
Agent for Orion ATO, LLC
rhawk@solasd.com
telephone (928) 342-3489

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 1200 Pennsylvania Avenue, N.W. WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Orion ATO, LLC P. O. Box 21720 Mesa, Arizona 85277	EPA Registration Number/File Symbol 88058-x
Active Ingredient(s) and/or representative test compound(s) cyclanilide	Date May 28, 2014
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) terrestrial food, terrestrial nonfood	Product Name Cyclanilide Technical

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose). ☐

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose). <input type="checkbox"/>	I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used). <input checked="" type="checkbox"/>
--	---

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements] I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA. ☒

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date May 28, 2014	Typed or Printed Name and Title Robert Hawk, Source Dynamics LLC, Agent for Orion ATO, LLC
--	----------------------	---

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date 5/28/2014

EPA Reg No./File Symbol 88058-x

Page 1 of 4

Applicant's/Registrant's Name & Address

Product

Orion ATO, LLC, P. O. Box 21720, Mesa, Arizona 85277

Cyclanilide Technical

Ingredient Cyclanilide

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	product identification and disclosure of ingredients	NEW	Orion ATO, LLC	OWN	
830.1600	description of beginning materials	NEW	Orion ATO, LLC	OWN	
830.1620	description of manufacturing process	NEW	Orion ATO, LLC	OWN	
830.1670	discussion of formation of impurities	NEW	Orion ATO, LLC	OWN	
830.1700	preliminary analysis	NEW	Orion ATO, LLC	OWN	
830.1750	certification of limits	NEW	Orion ATO, LLC	OWN	
830.1800	enforcement analytical method	NEW	Orion ATO, LLC	OWN	
830.6302	color	NEW	Orion ATO, LLC	OWN	
830.6303	physical state	NEW	Orion ATO, LLC	OWN	
830.6304	odor	NEW	Orion ATO, LLC	OWN	
830.6313	stability to normal and elevated temperatures	NEW	Orion ATO, LLC	OWN	
830.6314	oxidation / reduction: chemical incompatibility	NEW	Orion ATO, LLC	OWN	
830.6315	flammability	44634001 43368406	Bayer Cropscience LP Bayer Cropscience LP	OLD OLD	
830.6316	explosibility		not applicable; not potentially explosive		
830.6317	storage stability		not applicable; not a formulation		


Signature

Name and Title:
Robert Hawk, Agent, Orion ATO, LLC

Date: 5/28/2014


Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date 5/28/2014		EPA Reg No./File Symbol 88058-x		Page 2 of 4	
Applicant's/Registrant's Name & Address Orion ATO, LLC, P. O. Box 21720, Mesa, Arizona 85277		Product Cyclanilide Technical			
Ingredient Cyclanilide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
630.8319	miscibility		not applicable; not for use with oils		
830.8320	corrosion characteristics		not applicable; not a formulation		
830.6321	dielectric breakdown voltage		not applicable; not for homes		
830.7000	pH	NEW	Orion ATO, LLC	OWN	
830.7050	UV / visible absorption	43368406	Bayer Cropscience LP	OLD	
830.7100	viscosity		not applicable; solid		
830.7200	melting point	NEW	Orion ATO, LLC	OWN	
830.7220	boiling point		not applicable; solid		
830.7300	density / relative density	NEW	Orion ATO, LLC	OWN	
830.7370	dissociation constant in water	43368407	Bayer Cropscience LP	OLD	
830.7570	octanol / water partition coefficient	43368407	Bayer Cropscience LP	OLD	
830.7840	water solubility	43368408	Bayer Cropscience LP	OLD	
830.7860	solubility in organic solvents	43368408	Bayer Cropscience LP	OLD	
Signature 			Name and Title: Robert Hawk, Agent, Orion ATO, LLC		Date: 5/28/2014


Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date 5/28/2014			EPA Reg No./File Symbol 88058-x		Page 3 of 4
Applicant's/Registrant's Name & Address Orion ATO, LLC, P. O. Box 21720, Mesa, Arizona 85277			Product Cyclanilide Technical		
Ingredient Cyclanilide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7950	vapor pressure	43368409	Bayer Cropscience LP	OLD	
870.1100	acute oral toxicity: rat	43368423 43368424	Bayer Cropscience LP Bayer Cropscience LP	OLD	
870.1200	acute dermal toxicity	43368425 43368426	Bayer Cropscience LP Bayer Cropscience LP	OLD	
870.1300	acute inhalation toxicity	43368427 43368428	Bayer Cropscience LP Bayer Cropscience LP	OLD	
870.2400	acute eye irritation	43368429 43368430	Bayer Cropscience LP Bayer Cropscience LP	OLD	
870.2500	acute dermal irritation	43368431 43368432	Bayer Cropscience LP Bayer Cropscience LP	OLD	
870.2600	skin sensitization	43368433 43368434	Bayer Cropscience LP Bayer Cropscience LP	OLD	
Signature 			Name and Title: Robert Hawk, Agent, Orion ATO, LLC		Date: 5/28/2014

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date 5/28/2014			EPA Reg No./File Symbol 88058-x		Page 4 of 4
Applicant's/Registrant's Name & Address Orion ATO, LLC, P. O. Box 21720, Mesa, Arizona 85277			Product Cyclanilide Technical		
Ingredient Cyclanilide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
other Series 870: cite-all	Toxicology: other generic data	multiple	Bayer Cropscience LP	PAY	
Series 810: cite-all	Product Performance: generic data		Bayer Environmental Science	PAY	
Series 835: cite-all	Fate, Transport and Transformation: generic data		Nufarm Limited	PAY	
Series 840: cite-al	Spray Drift: generic data		Spray Drift Task Force	PAY	
Series 850: cite-al	Ecological Effects: generic data		Outdoor Residential Exposure Task Force	PAY	
Series 860: cite-all	Residue Chemistry: generic data		Agricultural Reentry Task Force	PAY	
Series 875: cite-all	Occupational and Residential Exposure: generic data		FIFRA Endangered Species Task Force	PAY	
			Agricultural Handlers Exposure Task Force	PAY	
Signature 			Name and Title: Robert Hawk, Agent, Orion ATO, LLC		Date: 5/28/2014

CYCLANILIDE TECHNICAL

For Manufacturing Use Only

ACTIVE INGREDIENT:

Cyclanilide [1-(((2,4-dichlorophenyl)amino)carbonyl)cyclopropanecarboxylic acid].....98.5%

OTHER INGREDIENTS: 1.5%**TOTAL** 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

(TO THE USER: If you cannot read or understand English, do not use this product until the label has been fully explained to you.)

For **MEDICAL** emergencies call the National Poison Control Center at 1-800-222-1222.

For **TRANSPORTATION** emergencies call Chemtrec at 1-800-424-9300.

FIRST AID

If swallowed	<ul style="list-style-type: none"> • Immediately call a Poison Control Center or doctor immediately for treatment advice. • Do not induce vomiting unless told to do so by the Poison Control Center or doctor. • Have a person sip a glass of water if able to swallow. • Do not give anything by mouth to an unconscious person.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 – 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a Poison Control Center or doctor for treatment advice.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth if possible. • Call a Poison Control Center or doctor for further treatment advice.
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 - 20 minutes. • Call a Poison Control Center or physician for treatment advice.

Note to Physician: There is no specific antidote. All treatment should be based on observed signs and symptoms of distress in the patient. Overexposure to materials other than this product may have occurred.

For **MEDICAL** emergencies call the National Poison Control Center at 1-800-222-1222. Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment.

Manufactured for:
Orion ATO, LLC
P. O. Box 21720
Mesa, Arizona 85277
Tel. 480-218-4289

EPA Registration No. 88058-x

Net Contents: 55 lbs (25 kgs)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING

May be fatal if swallowed. Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear goggles and face shield. Harmful if inhaled. Avoid breathing vapor. Harmful if absorbed through the skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. **Read the entire label before using this product.**

Only for formulation into a plant growth regulator for the following uses:

- (1) harvest aid to cotton;
- (2) ornamentals, cut flowers and non-bearing fruit trees in outdoor nursery and plant production facilities; do not use in greenhouses;
- (3) uses for which the U.S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and
- (4) uses for experimental purposes that are in compliance with U.S. EPA requirements.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage

Store unused product in original container only and out of reach of children and animals.

Pesticide Disposal

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal law. Dispose of wastes in accordance with local regulations. In case of spill, clean up spillage using shovels and avoiding skin contact. Carefully scoop up loose material and place it in appropriate containers so as to avoid dust generation. Ensure adequate decontamination of tools and equipment following cleanup.

Container Disposal

Nonrefillable container. DO NOT reuse or refill the liner bag. Completely empty liner bag by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into processing equipment. Then dispose of liner bag in a sanitary landfill or by incineration if allowed by State and local authorities. If burned, stay out of smoke. If fiber drum is contaminated and cannot be reused, dispose of in the same manner.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY NOTICE

Read the entire Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of ORION ATO, LLC or Seller. Handling, storage, and use of the product by Buyer or Users are beyond the control of ORION ATO, LLC and Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold ORION ATO, LLC and Seller harmless for any claims relating to such factors.

ORION ATO, LLC warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under conditions not reasonably foreseeable to or beyond the control of Seller or ORION ATO, LLC, and Buyer and User assume the risk of any such use. ORION ATO, LLC MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, ORION ATO, LLC or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ORION ATO, LLC AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR**

OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT SHALL BE, AT THE ELECTION OF ORION ATO, LLC OR SELLER, THE REPLACEMENT OF THE PRODUCT, OR COMPENSATION LIMITED TO DAMAGES NOT EXCEEDING THE FAIR MARKET PURCHASE PRICE, AND SHALL NOT INCLUDE INCIDENTAL OR CONSEQUENTIAL DAMAGES.

ORION ATO, LLC and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and limitations of warranty and of liability, which may not be modified except by written agreement signed by the duly authorized representative of ORION ATO, LLC.